

WWR# 040283681

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
JUDY A NELSEN
DONALD E NELSEN

Debtors

KEYBANK, N.A.

Movant

CASE NO. 19-10608-elf

CHAPTER 7

Hearing Date: 06/26/2019

Hearing Time: 10:00 a.m.

STIPULATION RESOLVING MOTION FOR RELIEF FROM AUTOMATIC STAY

Now this _____ day of _____, 2019. Upon the Motion of KeyBank, N.A. for Relief from Automatic Stay and the Response filed by the Debtor. Upon statements of counsel, the evidence and law:

This Court FINDS the KeyBank, N.A., Movant herein, is a creditor of the estate by virtue of a certain Retail Installment Contract with the Debtor, secured by 2014 Kia Sportage, VIN # KNDPB3AC9E7586733. That the Movant has not been adequately protected and that Movant is entitled to the relief prayed for in accordance with the terms set forth herein.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that KeyBank, N.A. be and is hereby granted relief from the Automatic Stay to take the necessary steps to repossess and liquidate its collateral referenced herein. That Debtor wishes to surrender Movant's collateral, more specifically described as one 2014 Kia Sportage, VIN # KNDPB3AC9E7586733. That the Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Reform Act of 1978 (The Code), 11 U.S.C. Section 362, is modified to allow the above-captioned Movant to exercise any and all of its remedies under its loan documentation and under state law to proceed with repossession and sale of 2014 Kia Sportage, VIN # KNDPB3AC9E7586733. That KeyBank, N.A. waives the right to file a claim for any deficiency balance remaining on the seizure and sale of the collateral.

Honorable Eric L. Frank
United States Bankruptcy Judge

/s/ Brian Langford
Attorney for Movant
Brian Langford
Weltman, Weinberg & Reis, Co. L.P.A.
436 7th Avenue, Suite 2500
Pittsburgh, PA 15219

/s/ Christopher Constantine Carr
Attorney for the Debtor
Christopher Constantine Carr
3240 Tynning Lane
Downingtown, AP 19335

/s/ Michael H Kaliner
For Trustee Michael H Kaliner
350 South Main Street, Suite 105
Doylestown, PA 18901